
OAR Box 1214

Prepped by Ollie Stewart

Document Number:

80) IV-D-46

Docket Number:

A-91-46

A-91-46
W-D-46

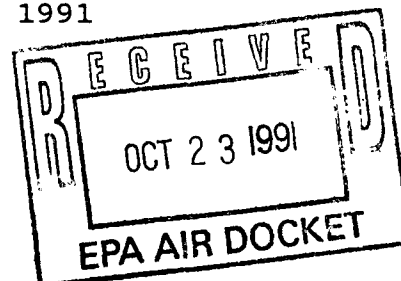
Fletcher Oil and Refining Company

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October 14, 1991

Environmental Protection Agency
Air Docket (LE-131)
401 M Street, S.W. Room M-1500
Washington, DC 20460



Dear Sirs:

Please grant the motor fuel waiver to permit MMT to be blended in unleaded gasoline sold in the United States.

Ford's 8-vehicle test fleet limited data does not seem to be statistically comparable in quality to a 48 car test program, utilizing cars from 3 manufacturers, done at an independent test facility.

As a small independent petroleum refinery, (and also a small business with 245 employees), we struggle to survive in an era of decreasing degrees of freedom in the production of motor gasolines. Our catalytic reformer is our only "octane machine" (we do not have an alkylation unit).

The benefit of utilizing MMT as an octane enhancing ingredient is important during normal operation as well as in situations of reformer catalyst poisoning, deactivation and mechanical reformer problems.

Very truly yours,

Richard D. Erdman
Vice President, Manufacturing

RDE:amw

cc: Mary T. Smith
Director, Field Operations and Support Division (EN-397F)
U.S. Environmental Protection Agency
401 M Street S.W.
Washington, DC 20460